

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DELAWARE TRUST COMPANY, as	:	
TCEH First Lien Indenture Trustee,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	No. 1:15-CV-2883 (PAE)(FM)
WILMINGTON TRUST, N.A., as First	:	
Lien Collateral Agent and First Lien	:	
Administrative Agent, and THE BANK OF	:	
NEW YORK MELLON TRUST	:	
COMPANY, N.A., as Escrow Agent,	:	
	:	
Defendants.	:	
	:	
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**NOTICE OF MOTION IN SUPPORT OF WILMINGTON TRUST, N.A.’S
MOTION TO TRANSFER VENUE**

PLEASE TAKE NOTICE that Defendant Wilmington Trust, N.A. (“Wilmington Trust”), in its capacity as First Lien Administrative Agent, moves this Court, before the Honorable Paul A. Engelmayer, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, for an Order transferring the above-captioned action to the United States District Court for the District of Delaware pursuant to 28 U.S.C. § 1404(a) and § 1412, from which it may be referred to the United States Bankruptcy Court for the District of Delaware pursuant to the Delaware District Court’s

amended standing order of reference. In further support of this Motion, Wilmington Trust relies on the Memorandum of Law of Defendant Wilmington Trust, N.A., as First Lien Administrative Agent, in Opposition to Plaintiff's Motion to Remand and in Support of Its Motion to Transfer Venue [Dkt. No. 58] and the Declaration of Jonathan Rosenberg, Esq. in Opposition to Delaware Trust Company's Motion to Remand and in Support of Wilmington Trust, N.A.'s Motion to Transfer Venue [Dkt. No. 60], filed May 6, 2015.

Dated: New York, New York

May 6, 2015

Respectfully submitted,

O'MELVENY & MYERS LLP

By: /s/ Jonathan Rosenberg

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Trust, N.A., in its capacity as
First Lien Administrative Agent*